

ORIGINAL

Galena Avionics

PO Box 60207
Fairbanks, AK 99706
August 23, 1999

6 2238

FAA CRS# E04R161M
Phone/FAX: 907-474-8980
E-mail:
72440.1135@compuserve.com

Department of Transportation Dockets
Docket No. FAA-1999-5836-43
Room 401
400 Seventh Street SW
Washington, DC 20590

Dear Sirs:

In regards to the NPRM for revision of FAR part 145:

We have read the preliminary comments from the National Air Transportation Association (NATA) and the Aircraft Electronics Association (AEA). The concerns which these trade organizations set forward are valid in the areas which relate to our business.

In addition to the comments submitted by these trade organizations, I am hereby submitting (1) a General Assessment of Impact and (2) Comments on Specific Paragraphs which I believe will have particularly adverse affects upon my business and other similar small shops.

General Assessment of Impact:

Galena Avionics is an FAA Certified Repair Station with Radio and Limited Airframe Ratings. It has been in business since 1977. It is a sole-proprietorship. There is only one employee (myself) who performs all duties including technical, inspection, record keeping, etc. During the past 22 years, the shop's record has been clean. To my knowledge, there have been zero accidents or incidents related to our workmanship or procedures. There have been zero regulatory violations.

In my judgment, the additional burden of the proposed regulations will neither enhance safety nor improve the quality of this shop's products or procedures. Rather, the new requirements for "approved" Quality Assurance and Training programs, and the burden of surveilling contracted certified repair stations, will necessitate adding one to three (1-3) new employees. Considering that the present sole-proprietor barely makes an adequate living, we would be forced out of business. This, in turn, would negatively impact the continued airworthiness of our customers' aircraft due to substantially increased costs and a substantial decrease in the number of available repair facilities.

99 AUG 26 PM 4:00
DEPT OF TRANSPORTATION
DOCKET CLERK

I believe that the FAA has grossly underestimated the impact of the proposed regulations on small businesses like mine. The FAA also has failed to appreciate the contribution to aviation safety made by hundreds of small certified repair stations which will not survive these regulatory changes.

Comments on Specific Paragraphs

145.61 (b) - Requirement for full compliance with new regulations upon any change to an existing certificate.

According to this paragraph, the two year grace period of paragraph 145.61 (a) will be forfeited by a certificate holder who is assigned a new postal zip code or telephone area code. The requirement for full compliance upon amendment should be limited to major changes, such as the addition of new categories of ratings or a major restructuring of the company.

145.103 (b)(1) - Requirement for permanent housing for largest aircraft type.

If this can be construed to apply to a CRS with a limited airframe rating, this is an unreasonable burden. Our limited airframe rating allows us to perform avionics installations in a variety of aircraft, from the Piper Cub to the DC-6. Much of this work is done on the ramp, since our peak season coincides with moderate weather. During periods of inclement weather, we utilize the customer's hangar (most 135 operators have adequate hangar facilities), or rent a hangar on an "as needed" basis. We cannot afford our own hangar.

145.153 and 145.159 - Requirement for an approved training program.

This requirement discounts the value of "long experience with the product or technique" referenced in the present 145.39(e). My detailed knowledge of a wide range of maintenance functions is the product of years of hands-on experience plus access to and study of product manufacturers' maintenance and installation manuals.

This rule mandates minimum annual training hours, but disregards the need or lack of need for such training. In the case of a small facility with very experienced and self-motivated personnel, a formal training program is not likely to contribute to improved performance. But it will contribute to increased costs due to lost production time and the added burden of program administration.

By the way, no training program can "ensure" performance of personnel (as the regulatory language mandates).

145.203 - Requirement for capabilities list by make and model.

This requirement is unnecessarily cumbersome. At present, we are rated for radio repair in certain categories. We are limited as to what units we can actually service by the maintenance manuals, bench test harnesses, etc. which we actually possess. Our manuals and harnesses are available for inspection by FAA personnel. This should be adequate.

Does the requirement for a detailed capabilities list preclude installation of equipment which we are not rated to repair? For example, a Horizontal Situation

Indicator (HSI) can be an integral part of an avionics installation. However, since it is a gyroscopic instrument, and since we are not rated to repair instruments, this device will not be included on our capabilities list. Can we install this unit?

145.20 1 (a)(1) and 145.207(d) - Establishment of Quality Assurance program.

Given our flawless track record to-date, it is hard to imagine that a formal Q.A. program will improve our performance. However, a formal Q.A. program would substantially increase our costs. Presumably, I would need to hire an inspector to independently inspect my work. Or, I would need to hire a worker whose work I could inspect. I would also need to develop forms and a record-keeping system for each item serviced. The added Q.A. program complexity and costs would not be more effective in assuring quality than the present simple system of satisfying myself that a given unit meets the manufacturer's specifications.

145.201(a)(2); 145.207(h)(3); and 145.213(a) - Requirement to surveil contractor's facilities to ensure quality control and regulatory compliance.

This shop subcontracts work only to FAA Certified Repair Stations. It is unreasonable to expect this small shop to duplicate the FAA's job of qualifying and surveilling such facilities. I estimate that such a requirement would unnecessarily increase costs, since several man-days would need to be invested per contractor per year (in the form of travel and inspection time). Furthermore, our surveillance of a contractor may place us in a legal bind with the contractor (should our findings be less favorable than those of the FAA), or with the FAA (should our findings be more favorable than those of the FAA, at a subsequent FAA inspection).

Frequently, the jobs contracted are beyond the scope of our certification. For example, in the course of avionics maintenance, we may identify a faulty gyroscopic instrument. Since this shop is not certified for instrument maintenance, we must have it repaired elsewhere. But we are in no position to evaluate the procedures of the FAA certified instrument shop, because we lack the expertise, manuals, etc. required to make such an evaluation.

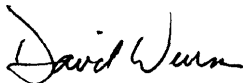
Let me suggest that it would be reasonable for us to provide the FAA with a list of the certified repair stations with which we contract, so that the FAA could advise us of any concerns which may arise in the course of FAA inspections of those repair stations.

145.22 1 - FAA Inspection of Facilities

It is unreasonable to expect us to guarantee access to a contractor's facilities for FAA inspectors. Since we contract only to certified repair stations, access for inspection is a matter between the contractor and the FAA alone.

We object to the removal of language requiring that the FAA make written notification of findings to us following an inspection of our facility. (Compare the present 145.23)

Respectfully submitted,



David Wurm, owner